

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

JAMES W. SWAYNE,

Plaintiff,

v.

Civil Action No. 10-3969

MOUNT JOY WIRE CORPORATION

Defendant.

Jury Trial Demanded

**DEFENDANT'S MOTION FOR SANCTIONS  
PURSUANT TO RULE 11 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

COMES NOW, Defendant Mount Joy Wire Corporation (hereinafter "Defendant"), by counsel, and, for the reasons set forth in the accompanying brief, requests that this Honorable Court to enter an Order imposing sanctions under Federal Rule of Civil Procedure 11 upon Plaintiff James W. Swayne (hereinafter "Plaintiff") and Plaintiff's counsel, the law firm of Renteria & Goldstein.

BARLEY SNYDER LLC

By: /s/ Stephanie Carfley  
Stephanie Carfley, Esquire  
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Wire Corporation

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Sanctions, and Brief In Support Thereof, Pursuant to Federal Rule of Civil Procedure 11 is being filed this 15th day of September, 2010 through the Court's ECF System and is available for viewing and is being served electronically through the ECF System upon Plaintiff as follows:

Michelle E. Goldstein, Esq.  
Renteria & Goldstein  
53 North Duke Street, Suite 203  
Lancaster, PA 17602

In addition to the above, a copy of the foregoing Motion has been hand-delivered to Plaintiff's counsel at the address set forth above.

BARLEY SNYDER LLC

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